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*Counsel for Defendant Eunsung Global Corp. – Additional counsel listed in signature*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

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HYDRAFACIAL LLC, formerly known as  
EDGE SYSTEMS LLC,

*Plaintiff,*

v.

LUVO MEDICAL TECHNOLOGIES INC.,  
CLARION MEDICAL TECHNOLOGIES,  
INC., EUNSUNG GLOBAL CORP., and  
HEALTHCARE MARKETS, INC., doing  
business as POWERED BY MRP,

*Defendants.*

**DEFENDANT EUNSUNG GLOBAL  
CORP.’S MOTION TO EXTEND  
TIME TO RESPOND TO THE  
COMPLAINT**

Case No.: 2:24-cv-00587-TC-JCB

Judge: Tena Campbell

Magistrate Judge: Jared C. Bennett

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**DEFENDANT EUNSUNG GLOBAL CORP.’S MOTION TO  
EXTEND TIME TO RESPOND TO THE COMPLAINT**

Defendant Eunsung Global Corp. (“Eunsung”) moves the Court to enter an order extending the deadline to file its response to the Complaint (Dkt. 1), until June 5, 2025.

The Court stayed this case very early in the case—almost four months before Eunsung’s

answer would have been due, Dkt. Nos. 16, 32.<sup>1</sup> The Court then lifted the stay on April 24, 2025, after a status conference and ordered the parties to file a motion for a scheduling order by May 6, 2025. Dkt. No. 54. The parties proposed different dates for the Answer deadline in the motion for scheduling order, but the motion was denied without prejudice without an order establishing an Answer date, and the parties were directed to conduct an Initial Case Management Conference and submit a motion for a scheduling order by May 22, 2025. Dkt. No. 59. Eunsung therefore respectfully requests that the Court enter an order establishing the deadline for it to Answer or otherwise respond to the Complaint by June 5, 2025. Good cause exists for this short extension because it would afford Eunsung adequate time to investigate Plaintiff's claims and evaluate Plaintiff's disclosure of accused instrumentalities (which Plaintiff is required to serve no later than May 22, 2025 under Judge Campbell's patent rule 3A) before preparing its response to the Complaint. Counsel for Plaintiff have informed Eunsung that they do not oppose June 5, 2025 as the Answer date.

Dated: May 13, 2025

Respectfully submitted,

HATCH LAW GROUP, PC

By: /s/ Brent O. Hatch

Brent O. Hatch

Adam M. Pace

**FISH & RICHARDSON P.C.**

Lauren A. Degnan (*pro hac vice*)

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<sup>1</sup> The Answer would have been due January 9, 2025, but the case was stayed on September 18, 2024, within one month of the filing of the Complaint.

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*Counsel for Defendant Eunsung Global Corp.*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served on May 13, 2025 with a copy of this document via the Court's CM/ECF system.

/s Brent O. Hatch